

United States Bankruptcy Court
Eastern District of Wisconsin

In re: Juan M. SANCHEZ, Jr. and Minerva I. SANCHEZ, Case No.: 19-26172-KMP
Debtor Chapter: 7
Address: 5208 Millbank Road Greendale, WI 53129
Employer's Tax Identification (EIN) No(s).: 46-4885895

Last four digits of Social Security No(s). : xxx-xx-3485
xxx-xx-0219

**OBJECTION TO MOTION OF MTGLQ INVESTORS LP FOR RELIEF
FROM AUTOMATIC STAY AND MOTION TO FILE INSTANTER**

DEBTOR, Juan M. SANCHEZ, Jr. and Minerva I. SANCHEZ, by and through counsel, Attorney T. Michael BARRETT does hereby object to the Motion of MTGLQ Investors L.P. for relief from the stay, and they request a hearing on the Motion, responding further that Debtors have expressed their intention to redeem the subject homestead, and with the strong housing market, the Movant MTGLQ will not be prejudiced by the stay, as Debtors will make the Movant MTGLQ whole in the final analysis.

MOTION TO EXTEND AND FILE INSTANTER

Debtors further move to allow this Objection to be lodged as if timely filed a day late, as Debtors' counsel has had to assist his daughter recover from major surgery which consisted of removal of excess tissue mass in both breasts this past week and this response had slipped.

Respectfully dated and submitted this 31st day of July, 2019:

Date July 31, 2019

Signature /s/ T. Michael Barrett
Name T. Michael Barrett 1001605
Address T. Michael BARRETT
12215 W. Bluemound Road, Ste. A
Wauwatosa, WI 53226